

1 HONORABLE BARBARA J. ROTHSTEIN
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9 UNITED STATES DISTRICT COURT
10 FOR THE WESTERN DISTRICT OF WASHINGTON
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13 SHANNON SPENCER, individually and on
14 behalf of all others similarly situated,
15 Plaintiff,

16 v.
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18 PROVIDENCE ST. JOSEPH HEALTH
19 FOUNDATION, a Washington nonprofit
20 corporation doing business as PROVIDENCE;
21 and DOES 1-20,

22 Defendants.

23 No. 2:23-CV-01723-BJR
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26 **STIPULATED MOTION
FOR EXTENSION OF
TIME AND ORDER**

27 **STIPULATION**

28 Plaintiff, Shannon Spencer (“Plaintiff”), and Defendant, Providence St. Joseph Health
29 Foundation (“Defendant”) (collectively, the “Parties”), by and through their respective
30 undersigned attorneys, respectfully submit this Stipulated Motion for Extension of Time of the
31 following deadlines.

32 Pursuant to Federal Rule of Civil Procedure 6(b), the Parties jointly request as follows:

33 1. For Plaintiff’s deadline to bring a Motion to Remand:

34 a. To extend the deadline for filing a Motion to Remand to January 19,
35 2024.

36 2. For the FRCP 26(f) conference and initial disclosures:

37 STIPULATED MOTION FOR EXTENSION
38 OF TIME AND ORDER - 1

39 317221329.1

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- a. To set the FRCP 26(f) conference deadline to February 2, 2024; and
- b. To set the initial disclosure deadline to February 8, 2024.

The Parties respectfully request this extension to provide them with the requisite time to gather information and engage in meaningful discussions as to whether this matter may be resolved.

DATED December 7, 2023

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Attorneys for Plaintiff

**STIPULATED MOTION FOR EXTENSION
OF TIME AND ORDER - 2**

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CERTIFICATE OF SERVICE

I certify that on December 7, 2023, I caused the foregoing document to be served on the parties listed below in the manner indicated:

<p>Timothy W. Emery, WSBA #34078 Patrick B. Reddy, WSBA #34092 Paul Cipriani, WSBA #59991 Emery Reddy PLLC 600 Stewart Street, Suite 1100 Seattle, WA 98101 Phone: 206-442-9106 Email: emeryt@emeryreddy.com reddyp@emeryreddy.com paul@emeryreddy.com</p>	<p><input checked="" type="checkbox"/> Via U.S. 1st Class Mail <input type="checkbox"/> Via Hand Delivery <input type="checkbox"/> Via Overnight Delivery <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via Email <input checked="" type="checkbox"/> E-Service</p>
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DATED December 7, 2023, at Seattle, Washington.

By: s/Abigail D. Belscher
Abigail D. Belscher, Practice Assistant
Abigail.Belscher@klgates.com

**STIPULATED MOTION FOR EXTENSION
OF TIME AND ORDER - 3**

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ORDER

Upon consideration of the Parties' Stipulated Motion for Extension, the Court finds that good cause exists to extend certain deadlines, and it is hereby **ORDERED** that the Motion is **GRANTED**.

It is **FURTHER ORDERED** that filing deadlines will be modified as follows.

Event	Current Date	New Date
Motion to Remand	December 10, 2023	January 19, 2024
FRCP 26(f) Conference	December 15, 2023	February 2, 2024
Initial Disclosure Deadline	December 22, 2023	February 8, 2024
Joint Status Report	December 29, 2023	February 15, 2024

DATED this 7th day of December, 2023.

Barbara Pothlein

HONORABLE BARBARA J. ROTHSTEIN